



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101

JUN 26 1989

MEMORANDUM

SUBJECT: Potentially Responsible Parties
Superior Solvents/Thompson Chemical Site
St. Louis, Missouri

FROM: Pauletta R. France-Isetts, P.E. *Pauletta*
REML/SPFD/WSTM

TO: Daniel J. Shiel
Assistant Regional Counsel

THRU: Ronald E. King, Chief *R. King*
REML/SPFD/WSTM

Baerbel Schiller
Associate Regional Counsel

As discussed during our meeting of May 23, 1989, I am formally transmitting the list of entities that I consider to be Potentially Responsible Parties (PRPs) at the Superior Solvents/Thompson Chemical site in St. Louis, Missouri. In addition to the list, I am providing a brief description of why I think they should be PRPs at the site. A second memorandum identifying a proposed time schedule will be forthcoming soon.

The following entities should, in my opinion, be considered PRPs at the referenced site for the reasons identified. These are the parties to whom, in my opinion, Information Request and Special Notice letters (in advance of a fund-financed RI/FS) should be sent. Please inform me as to your determination with regards to each party's liability within two weeks of receipt of this memo. ✓

- 1) Superior Oil Company -- currently owns four of the ten parcels which comprises the "site"; they currently lease the remaining parcels of land. Recent EPA sampling indicated high concentrations of volatile organic compounds (VOCs) contaminants in the sewer beneath the site. Increased concentrations of TCDD were also indicated in conjunction with the VOCs.

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- 2) Union Pacific Railroad -- currently owns five of the ten parcels which comprise the "site". Union Pacific or its predecessor Missouri Pacific has owned these parcels since the early 1900s. Lessees of the property have included Thompson Chemical, Wood Treating Chemicals and Superior Oil.
- 3) Allied-Signal -- Allied-Signal is the successor corporation to Allied Chemical and Dye Corporation. Allied Chemical and Dye obtained interest in Barrett Manufacturing in 1941. They owned and operated at the facility until 1947. Barrett Manufacturing produced coal-tar chemicals, refined coal-tar, manufactured roofing and protective coatings and distributed coke-oven products and nitrogen materials. EPA sampling has revealed the presence of twenty-three semi-volatile organic compounds. The buried tank removed from the site was, according to aerial photographs, left by Allied Chemical and/or Barrett Manufacturing. The wooden conduit exposed during the tank removal is, according to historians of the St. Louis area, typical of transfer lines used along the Mississippi River during the early 1900s. The materials in the wooden conduit would indicate that this transfer line was used by Barrett Manufacturing.
- 4) Monsanto Chemical Company -- Monsanto leased a portion of the site from 1957 to 1963. Storage tanks containing various benzenes and naphtha compounds were on the leased property. Monsanto apparently had a spill, which they cleaned (no analytical data was generated), during decommissioning of the tanks according to documentation in the files.

Wood Treating Chemicals, a wholly owned subsidiary of Monsanto, was the owner of four site parcels between 1963 and 1974. According to information in our files, Monsanto put \$250,000 in a Wood Treating bank account for operational expenses. Wood Treating Chemicals became exclusive sales agent for selling Monsanto pentachlorophenol (PCP). A lease signed by Monsanto confirms that the storage tanks were leased for substances commonly used as carriers for PCP in the wood treating process. In addition, Monsanto employees were directors of Wood Treating Chemicals and according to the Davy Eaglesfield interview of R M Morriss, the president and secretary-treasurer of Wood Treating Chemicals were employees of and paid

by the Organic Chemical Division of Monsanto Corporation. He also indicated that Monsanto assigned accounts to Wood Treating Chemicals who were paid by WTC and that legal work and insurance for WTC were handled through Monsanto.

- 5) Thompson Chemical Company -- Thompson Chemical operated at the site from 1950 to about 1970. They used 2,4-D and 2,4,5-T to formulate herbicides during their tenure at the site. Thompson employees admit to dumping materials down the storm sewer, which leads directly to the Mississippi River. Testing conducted by Thompson Chemical indicated that the level of dioxin in the chemicals they produced was less than .10 ppm (100 ppb). Several interviews have collaborated that the housekeeping practices of Thompson at the site were lax.
- 6) R. M. Morriss -- Mr. Morriss and his father operated as Associated Sales and Supply which owned several parcels of the site during the 1950s. Associated subsequently leased the property to other entities. Mr. Morriss was also active in the day to day business dealings of Wood Treating Chemicals as Vice-President and General Manger.

If you are unable to make your determination within two weeks, please indicate to me when you can make the determination. ✓
It is important that we proceed with this project, if we are to perform the focused RI/FS during this construction season. If you require further information, please contact me at extension 701.